

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
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U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

UNITED STATES OF AMERICA :

vs. :

KATURA J. MOZELLE :
KINTE K. GREEN :

NO. 2:10-cr-168
18 U.S.C. §371
18 U.S.C. §1028A(a)(1)
18 U.S.C. §1344

JUDGE FROST

I N D I C T M E N T

THE GRAND JURY CHARGES:

COUNT 1

1. Beginning on or about December 22, 2005, and continuing until on or about August 31, 2006, in the Southern District of Ohio, the defendant, KATURA J. MOZELLE devised a scheme and artifice to defraud Bank of America, a financial institution with deposits insured by the Federal Deposit Insurance Corporation, to obtain money, funds, credits, assets, securities or other property owned by, or under the custody or control of Bank of America by means of false and fraudulent pretenses and representations.

2. As part of the scheme and artifice to defraud and to obtain money by false and fraudulent pretenses and representations, on December 22, 2005, defendant KATURA J. MOZELLE, opened an account at Bank of America and was issued a Bank of America VISA card, account no. 4888-9320-3528-3715 with a credit limit of \$1,750.

3. As part of the scheme and artifice to defraud, defendant KATURA J. MOZELLE, immediately used the Bank of America VISA card to purchase merchandise at

various retail stores within the central Ohio area, including but not limited to Wal-Mart, Footlocker, Game Stop, and Best Buy, thereby exceeding her credit limit.

4. As part of the scheme and artifice to defraud, defendant KATURA J. MOZELLE, also used the Bank of America VISA card at various hotels, including but not limited to Doubletree Guest Suites and Comfort Inn.

5. As further part of the scheme and artifice to defraud, defendant KATURA J. MOZELLE, in order to increase her credit limit, would purportedly make large payments on her account, via the pay by phone method.

6. As further part of the scheme and artifice to defraud, defendant KATURA J. MOZELLE, would make these purported payments, approximately \$13,298.00, from accounts that had non-sufficient funds to cover the payments or from accounts that were fraudulent.

7. In order to execute and attempt to execute the aforesaid scheme and artifice to defraud and to obtain money, funds, credits, assets, securities or other property by means of false and fraudulent pretenses and representations, on December 30, 2005, defendant KATURA J. MOZELLE, made three payments via pay by phone, in the amounts of \$1,698.00, \$1,700.00, and \$1,650.00 respectively, all of which were reversed as fraudulent transactions, thus causing a loss to Bank of America of approximately \$15,842.00.

In violation of 18 U.S.C. §1344.

COUNT 2

1. From on or about July 1, 2006 and continuing thereafter until on or about August 1, 2007, the exact dates being unknown, in the Southern District of Ohio and elsewhere, defendants KINTE K. GREEN and KATURA J. MOZELLE, together with diverse

other persons, both known and unknown to the United States Attorney but not charged in this Indictment, knowingly and willfully conspired and agreed together and with each other to commit offenses against the United States, to wit, to knowingly execute or attempt to execute a scheme to defraud federally insured financial institutions, including but not limited to J.P. Morgan Chase, National City Bank, Washington Mututal Bank, and Bank of America, with the intent to obtain money, funds, credits, assets, securities or other property owned by, or under the custody or control of such institution by means of false and fraudulent pretenses and representations, in violation of Title 18 U.S.C. §1344.

THE CONSPIRACY AND ITS OBJECTS

2. It was the object of the conspiracy among and between defendants, KINTE K. GREEN and KOTURA J. MOZELLE, together and with diverse other persons both known and unknown to the Grand Jury but not charged in this Indictment, (a) to obtain personal identifiers, including the name, date of birth, driver's license number, and social security number of individuals who had accounts at the various banks, and (b) to take over the existing credit account by contacting the financial institution, reporting the card lost or stolen, changing the address, and then having new cards issued and sent to the new address without the knowledge of the legitimate account holder, thereby enabling the conspirators to to defraud the financial institutions involved and to obtain money, funds, credits, assets, securities or other property owned by, or under the custody or control of those financial institutions.

MANNER AND MEANS OF THE CONSPIRACY

3. The manner and means of the conspiracy was as follows:

(a) One or more of the conspirators would access the Franklin County Municipal Court web-site, entering random social security numbers, changing one digit at a time, until locating an individual who had been through the Franklin County Municipal Court system;

(b) From the website, one or more of the conspirators would then obtain a name, address, date of birth, social security number, and driver's license number of various individuals;

(c) One or more of the conspirators would then go to a credit reporting bureau web-site, such as Equifax, and obtain the individual's credit report;

(d) Using the credit report, one or more of the conspirators would then take over an existing credit account by contacting the financial institution, reporting the card lost or stolen, changing the address, then having new cards issued and sent to the new address.

(e) Using the fraudulently obtained credit cards, and oftentimes using online shopping sites, the conspirators then purchased goods and services worth thousands of dollars.

OVERT ACTS

7. In furtherance of the conspiracy, and to effect the objects thereof, at least one of the following overt acts, among many other overt acts, were committed in the Southern District of Ohio and elsewhere:

- (1) On or about January 29, 2007, defendants KINTE K. GREEN and KATURA J. MOZELLE opened, via the internet, a fraudulent National City bank account in the name W.M.
- (2) On or about May 16, 2007, defendants KINTE K. GREEN and KATURA J. MOZELLE attempted to open, via the internet, a fraudulent Bank of America account in the name J.H.
- (3) On or about June 1, 2007, defendants KINTE K. GREEN and KATURA J. MOZELLE opened, via the internet, a fraudulent Credit One Bank account in the name H.D.
- (4) On or about June 6, 2007, defendants KINTE K. GREEN and KATURA J. MOZELLE attempted to open, via the internet, a fraudulent J.P. Morgan Chase Bank account in the name M.H.
- (5) On or about July 5, 2007, defendant KINTE K. GREEN and KATURA J. MOZELLE opened, via the internet, a fraudulent Bank of America account in the name J.P.
- (6) On or about July 9, 2007, defendants KINTE K. GREEN and KATURA J. MOZELLE, via the phone, changed the address of J.P. in order to receive J.P. Morgan Chase Bank cards in the name J.P.
- (7) On or about July 18, 2007, defendants KINTE K. GREEN and KATURA J. MOZELLE opened, via the internet, a fraudulent Washington Mutual account in the name N.P.
- (8) On or about August 1, 2007, defendants KINTE K. GREEN and KATURA J. MOZELLE opened, via the internet, a fraudulent Discover Card account in the name W.M.

In violation of 18 U.S.C. §371.

COUNT 3

1. On or about May 16, 2007, in the Southern District of Ohio, defendants KINTE K. GREEN and KATURA J. MOZELLE, during and in relation to a felony violation, that is, knowingly executing and attempting to execute a scheme to defraud a financial institution with deposits insured by the Federal Deposit Insurance Corporation, and with the specific intent of obtaining money, funds, credits, assets, securities, or other property by means of false and fraudulent pretenses and representations in violation of 18 U.S.C. §1344, defendants KINTE K. GREEN and KATURA J. MOZELLE, knowingly transferred, possessed or used, without lawful authority, a means of identification of another person, to wit, the name and social security number of one J.H., in order to open a Bank of America account in the name J.H..

In violation of 18 U.S.C. §1028A(a)(1) and §2.

COUNT 4

1. On or about June 1, 2007, in the Southern District of Ohio, defendants KINTE K. GREEN and KATURA J. MOZELLE, during and in relation to a felony violation, that is, knowingly executing and attempting to execute a scheme to defraud a financial institution with deposits insured by the Federal Deposit Insurance Corporation, and with the specific intent of obtaining money, funds, credits, assets, securities, or other property by means of false and fraudulent pretenses and representations in violation of 18 U.S.C. §1344, defendants KINTE K. GREEN and KATURA J. MOZELLE, knowingly transferred, possessed or used, without lawful authority, a means of identification of another person, to wit, the name and social security number of H.D., in order to open a Credit One Bank account account in the name H.D.

In violation of 18 U.S.C. §1028A(a)(1) and §2.

COUNT 5

1. On or about June 6, 2007, in the Southern District of Ohio, defendants KINTE K. GREEN and KATURA J. MOZELLE, during and in relation to a felony violation, that is, knowingly executing and attempting to execute a scheme to defraud a financial institution with deposits insured by the Federal Deposit Insurance Corporation, and with the specific intent of obtaining money, funds, credits, assets, securities, or other property by means of false and fraudulent pretenses and representations in violation of 18 U.S.C. §1344, defendants KINTE K. GREEN and KATURA J. MOZELLE, knowingly transferred, possessed or used, without lawful authority, a means of identification of another person, to wit, the name and social security number of one M.H., in order to open a J.P. Morgan Chase account in the name M.H.

In violation of 18 U.S.C. §1028A(a)(1) and §2.

COUNT 6

1. On or about July 18, 2007, in the Southern District of Ohio, defendants KINTE K. GREEN and KATURA J. MOZELLE, during and in relation to a felony violation, that is, knowingly executing and attempting to execute a scheme to defraud a financial institution with deposits insured by the Federal Deposit Insurance Corporation, and with the specific intent of obtaining money, funds, credits, assets, securities, or other property by means of false and fraudulent pretenses and representations in violation of 18 U.S.C. §1344, defendants KINTE K. GREEN and KATURA J. MOZELLE, knowingly transferred, possessed or used, without lawful authority, a means of identification of another person, to wit, the name and social security number of one N.P., in order to open a Washington Mututal account in the name N.P.

In violation of 18 U.S.C. §1028A(a)(1) and §2.

COUNT 7

1. On or about July 5, 2007 in the Southern District of Ohio, defendants KINTE K. GREEN and KATURA J. MOZELLE, during and in relation to a felony violation, that is, knowingly executing and attempting to execute a scheme to defraud a financial institution with deposits insured by the Federal Deposit Insurance Corporation, and with the specific intent of obtaining money, funds, credits, assets, securities, or other property by means of false and fraudulent pretenses and representations in violation of 18 U.S.C. §1344, defendants KINTE K. GREEN and KATURA J. MOZELLE knowingly transferred, possessed or used, without lawful authority, a means of identification of another person, to wit, the name and social security number of one J.P., in order to open a Bank of America account in the name J.P.

In violation of 18 U.S.C. §1028A(a)(1) and §2.

COUNT 8

1. On or about January 29, 2007, in the Southern District of Ohio, defendants KINTE K. GREEN and KATURA J. MOZELLE, during and in relation to a felony violation, that is, knowingly executing and attempting to execute a scheme to defraud a financial institution with deposits insured by the Federal Deposit Insurance Corporation, and with the specific intent of obtaining money, funds, credits, assets, securities, or other property by means of false and fraudulent pretenses and representations in violation of 18 U.S.C. §1344, defendants KINTE K. GREEN and KATURA J. MOZELLE knowingly transferred, possessed or used, without lawful authority, a means of identification of another person, to wit, the name and social security

number of one W.M., in order to obtain a National City Bank card and a Discover Card in the name W.M.

In violation of 18 U.S.C. §1028A(a)(1) and §2.

A TRUE BILL.

/s/
FOREPERSON

CARTER M. STEWART
United States Attorney


GARY L. SPARTIS
Columbus Branch Chief